

# **EXHIBIT F**

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14  
15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
17 **SAN FRANCISCO DIVISION**

18 MONITA SHARMA and ERIC  
19 ANDERSON, on behalf of themselves  
20 and all others similarly situated,

21 Plaintiffs,

22 v.

23 BMW OF NORTH AMERICA, LLC, a  
24 Delaware Limited Liability Company,

25 Defendant.

Case No. 3:13-cv-02274-MMC

**PLAINTIFFS' FIRST SET OF  
DOCUMENT REQUESTS TO  
DEFENDANT BMW OF NORTH  
AMERICA, LLC**

26 Pursuant to Federal Rule of Civil Procedure 34, Plaintiffs Monita Sharma and Eric  
27 Anderson ("Plaintiffs") hereby serve the following document requests to Defendant BMW of  
28 North America, LLC ("BMW NA" or "Defendant"). Plaintiffs request that BMW NA produce  
the following documents at the offices of Wexler Wallace LLP, 55 West Monroe Street, Suite  
3300, Chicago, Illinois 60603, in the format agreed to by the parties. Each request is subject to  
the Definitions and Instructions below.

1           18.     The present tense shall be construed to include the past tense and the past tense  
2 shall be construed to include the present tense as necessary to bring within the scope of these  
3 Requests any information that might otherwise be construed to be outside their scope.

4           19.     The singular shall be construed as the plural and the plural shall be construed to  
5 include the singular as necessary to bring within the scope of these Requests any information that  
6 might otherwise be construed to be outside their scope.

7           20.     A request to identify an individual is a request to provide the individual's full  
8 name, job title, and—if no longer working for You—last known address for the individual.

9           21.     These interrogatories are continuing in nature and require supplementation and  
10 correction to the full extent required by the Federal Rules of Civil Procedure and local rules.

11                               **DOCUMENT REQUESTS**

12           1.     The native files of all computer-aided design (CAD) models/drawings, 2-  
13 dimensional drawings or models of the Electronic Component Parts and Drainage Tubes in the  
14 Class Vehicles.

15           2.     All Documents that reference or relate to design specifications for the Electronic  
16 Component Parts and Drainage Tubes for the Class Vehicles. This includes drawings, blueprints  
17 and diagrams, 2-dimensional drawings and native electronic files of any computer-aided design  
18 (CAD) drawing or modeling of the components, themselves, as well as the location of those  
19 components and surrounding components.

20           3.     Documents describing BMW NA's decision-making process for locating the  
21 Electronic Component Parts where it did in the Class Vehicles.

22           4.     All Documents concerning any analysis used to identify hazards and minimize the  
23 risk of failure associated with water, liquid, or moisture intrusion in the Electronic Component  
24 Parts for the Class Vehicles. This includes, but is not limited to, any Fault Tree Analyses (FTA),  
25 Failure Modes and Effects Analyses (FMEA—also known as Failure Modes, Effects and  
26 Criticality Analyses or FMECA), Fishbone diagrams, Preliminary Hazard Analyses (PHA), or  
27 other similar documents.  
28

1           b.     that the claims of the named Plaintiffs are typical of those of the rest of the  
2 putative Class members;

3           c.     the adequacy of the named Plaintiffs or proposed Class Counsel;

4           d.     Predominance of common issues of law or fact;

5           e.     the manageability of this case as a class action at trial; and

6           f.     the superiority of a class action to adjudicate the issues set out in the  
7 Complaint.

8       44.    All Documents that You receive pursuant to any subpoena that You serve related  
9 to this case.

10       45.   From 1998 to present, a copy of each of Your organizational charts that identify  
11 the employees or entities and/or their departments involved in handling general and/or warranty  
12 claims submitted by consumers and/or their representatives, BMW retailers, and/or retailers of the  
13 Class Vehicles in this action.

14       46.   From 1998 to present, a copy of each of Your organizational charts that identify  
15 the employees or entities and/or their departments involved in providing customer service to any  
16 purchasers or lessees of the Class Vehicles, or support to any authorized service persons.

17       47.   A copy of the curriculum vitae of any expert that you intend to use to testify on  
18 Your behalf in this litigation.

19       48.   All DVPRs, DVRS, or Documents related to testing performed to verify the design  
20 of the Electronic Component Parts and/or Drainage Tubes, including, but not limited to the  
21 durability of those components and the location of the Electronic Component Parts.

22       49.   All Documents that reference or relate to design specifications of the Electronic  
23 Component Parts and Drainage Tubes in the Class Vehicles. This includes drawings, blueprints  
24 and diagrams.

25 Dated: March 16, 2015

WEXLER WALLACE LLP

26  
27 By:   
28

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